

**REMARKS**

The present amendment is submitted in response to the Office Action dated October 21, 2004, which set a three-month period for response, making this amendment due by January 21, 2005.

Claims 1-12 are pending in this application.

In the Office Action, claims 1-5 and 8-10 were rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 6,742,039 to Remer. Claims 6, 7, and 11 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Remer et al in view of U.S. Patent No. 6,061,798 to Coley.

The Applicants respectfully disagree that the cited references anticipate or make obvious the present invention as defined in claims 1-11.

A main objective of the present invention, as defined in independent claims 1 and 8, is to provide a method and arrangement for establishing a data connection between a first computing device and a second computing device, comprising the steps of establishing a data connection to the second computing device through a third and fourth computing device. The first computing device sends a query signal to the third computing device. The third computing device checks the query signal and supplies the query signal to a fourth computing device if a predetermined query signal is available. The fourth computing device tests the query signal and establishes a data connection between the first and second computing devices over the third and fourth computing device, if a predetermined parameter is available.

Therefore, the present invention provides a distinct advantage, in that the establishing of the connection is done by the fourth computing device and the data connection is routed from the first computing device over the third and fourth computing device to the second computing device.

In view of the above, the present invention also provides the advantage that a firewall can be used which comprises the third computing device and an external proxy is used that is made up of the fourth computing device. This means that for every new application or protocol, the method of the present invention can use a new external proxy without changing the firewall. This has the advantage that the present invention could use a voice-over IP, for example, in existing firewalls without exchanging the firewalls themselves. This saves time and money associated with the changes.

The Applicants respectfully submit that Remer is not a proper reference under 35 USC 102 pursuant to the guidelines set forth in the last paragraph of **MPEP section 2131**, where it is stated that "a claim is anticipated only if each and every element as set forth in the claims is found, either expressly or inherently described, in a single prior art reference", and that "the identical invention must be shown in as complete detail as is contained in the ... claim".

The cited reference to Remer discloses a method with a first computing device (a remote computer) and a second computing device (a local computer) over a third computing device (ACM) and a fourth computing device (trusted arbitrator). However, the arrangement functions completely differently compared to the arrangement and method of the present invention. If the remote computer

wants to have a data connection to the local computer, it delivers a query signal to the third computing device (ACM). The third computing device sends the query signal to the fourth computing device (trusted arbitrator). The fourth computing device checks the query signal and if it is in order, a data connection is formed from the first computing device over the third computing device to the second computing device (local computer). Therefore, the data connection is only routed through the third computing device, as disclosed in Remer, column 3, lines 14-22.

In Remer, the fourth computing device (trusted arbitrator) is only used for examining the authentication identify of the remote computer, and if the first computing device (remote computer) is allowed to exchange data with a second computing device within the local area network, the fourth computing device (trusted arbitrator) is not part of the data exchange. Information may flow between the local area network and the fourth computing device (trusted arbitrator), however, only information that is necessary to examine whether the first computing device (remote computer) should be allowed to exchange data with a second computing device within a local area network (see Remer, column 3, lines 14-22).

In contrast, according to the present invention, the entire data are exchanged between the first computing device, the third computing device, the fourth computing device, and back to the third computing device to the second computing device, as shown in Figure 2 of the present application.

In addition, in the present invention, the third computing device may initiate firewall functions and the fourth computing device transmits and changes the target and the sender addresses of the signals.

Therefore, the method and arrangement of the present invention provide the advantage that the fourth computing device can be exchanged depending on the used data protocol without exchanging the third computing device.

Therefore, the main functions of exchanging data between the first and second computing devices are located in the third computing device that does not have to be exchanged if a new data protocol is used. As an example, the third computing device could be used as a firewall and the fourth computing device as an external proxy. If, in this system, for example, a new data protocol, such as a voice-over IP, is used in the future, it is not necessary to exchange the firewall, but it is sufficient to exchange only the external proxy, which is cheaper and requires less time.

Because Remer fails to disclose these features of independent claims 1 and 8, the rejection under Section 102 must be withdrawn. Anticipation requires the presence in a single prior art reference disclosure of each and every element of the claimed invention, arranged as in the claim. *Lindemann Maschinenfabrik GmbH v. American Hoist & Derrick Co.*, 221 USPQ 481, 485 (Fed. Cir. 1984).

Likewise, the Applicants respectfully submit further that claim 5 is not anticipated by the Remer patent. Again, it is respectfully submitted that Remer is

not a proper reference under either **MPEP section 2131 or section 2143.03**, since the reference does not teach or suggest every element of claim 5.

Remer does not disclose any information regarding the address being converted by the fourth computing device into its own address and supplying the changed establishment signal to the second computing device as a target address. Furthermore, Remer does not disclose any information on changing the addresses. Therefore, the Applicants strongly disagree that Remer anticipates claim 5.

The Applicants have added new claim 12, which combines the features of claims 1 and 5.

For the reasons set forth above, the Applicants respectfully submit that claims 1-12 are patentable over the cited art. The Applicants further request withdrawal of the rejections under 35 U.S.C. 102 and 103 and reconsideration of the claims as herein amended.

In light of the foregoing amendments and arguments in support of patentability, the Applicants respectfully submit that this application stands in condition for allowance. Action to this end is courteously solicited.

Should the Examiner have any further comments or suggestions, the undersigned would very much welcome a telephone call in order to discuss appropriate claim language that will place the application into condition for allowance.

Respectfully submitted,



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